

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 08-_____</b>
	<b>:</b>	<b>DATE FILED: _____</b>
<b>v.</b>	<b>:</b>	<b>VIOLATION:</b>
<b>SUSAN SKOTNICKI,</b>	<b>:</b>	<b>18 U.S.C. § 1341 (mail fraud - 1 count)</b>
<b>a/k/a "Susan Swett"</b>		<b>18 U.S.C. § 981 (criminal forfeiture)</b>

**INFORMATION**

**COUNT ONE**

**(Mail Fraud)**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

**I. BACKGROUND**

At all times material to this information:

1. Defendant SUSAN SKOTNICKI, a/k/a "Susan Swett," was, from approximately 1978 to 2008, an executive secretary and aide to a Pennsylvania state senator (hereafter the "Senator"), and worked inside the Senator's office in the State Capitol in Harrisburg, Pennsylvania. Her responsibilities included, among others, the preparation and submission of legislative expense vouchers to the Chief Clerk of the Senate of Pennsylvania on behalf of the Senator requesting reimbursement for expenses incurred in connection with official business.
2. La Veranda was a highly acclaimed restaurant which specialized in Northern Italian cuisine and was located at Pier 3, Penn's Landing, in Philadelphia, Pennsylvania.
3. The Senator was a frequent patron of La Veranda, and established three separate "house accounts" there to which he charged all of his meals. These house accounts were

maintained under the names of the Pennsylvania Senate, Pennsylvania Savings Bank, and the Senator's campaign committee.

### **THE SCHEME TO DEFRAUD**

4. Between on or about January 1, 2001, or earlier, and on or about December 21, 2004, defendant

**SUSAN SKOTNICKI,  
a/k/a "Susan Swett,"**

devised and intended to devise a scheme to defraud the Senate of Pennsylvania, and to obtain money and property from the Senate of Pennsylvania by means of knowingly false and fraudulent pretenses, representations, and promises.

5. It was the object of the scheme described in paragraph 4 for defendant SUSAN SKOTNICKI to prepare and submit to the Senate of Pennsylvania fraudulent legislative expense vouchers which inflated the actual expenses claimed by the Senator for meals for official business, resulting in the issuance of excessive reimbursement checks by the Commonwealth of Pennsylvania of which defendant SKOTNICKI was able to convert a large portion for her own personal use and benefit. These fraudulent legislative expense vouchers predominantly relied on inflated invoices for meals at La Veranda. The scheme caused a gain to SKOTNICKI and losses to the Commonwealth of Pennsylvania of more than \$60,000.

### **MANNER AND MEANS**

It was part of the scheme to defraud that:

6. During the period from at least 2001 or earlier through 2004, defendant SUSAN SKOTNICKI received, by United States mail, all of the house account statements from the La

Veranda restaurant that listed all of the meals which the Senator had claimed were for official Senate business and had charged to his Pennsylvania Senate house account.

7. Upon her receipt of these La Veranda house account statements, defendant SUSAN SKOTNICKI prepared a new document, bearing the letterhead of the La Veranda restaurant which she had copied, that falsely listed an inflated amount of meal charges, along with other false information, including fictitious dates of meals.

8. Defendant SUSAN SKOTNICKI then attached each of the fraudulent La Veranda invoices to a legislative expense voucher which she prepared, also falsely noting that the inflated invoices reflected meals served to large groups of persons, including the Senator, in order to reduce the likelihood that the large dollar amounts would trigger suspicion.

9. Between January 2001 and December 2003, the total number of La Veranda meals and reimbursement amounts that defendant SUSAN SKOTNICKI fraudulently claimed on vouchers submitted to the Senate of Pennsylvania for reimbursement is summarized as follows:

Year	Number of Meals	Average Number of Guests	Total Amount Reimbursed
2001	47	23	35,220.40
2002	46	21	30,135.00
2003	7	22	5,801.00
<b><u>Total:</u></b>	<b><u>100</u></b>	<b><u>22</u></b>	<b><u>\$71,156.40</u></b>

10. Between January 2001 and December 2003, the difference between the fraudulent La Veranda invoices submitted by defendant SUSAN SKOTNICKI to the Senate of Pennsylvania and the actual cost of the meals charged to the Senate house account at La Veranda is summarized as follows:

<b>Month/Year</b>	<b>Amounts of False Invoices Submitted to Senate</b>	<b>Actual Amounts of Authentic La Veranda Invoices</b>
January-01	2,141.70	Unknown
February-01	1,795.10	Unknown
March-01	3,409.25	Unknown
April-01	4,144.00	Unknown
May-01	3,856.45	Unknown
June-01	3,295.50	144.96
July-01	1,983.25	599.50
August-01	908.80	72.32
September-01	2,768.80	585.21
October-01	4,005.05	527.71
November-01	1,795.85	3,002.80
December-01	5,116.65	277.88
January-02	2,855.30	0.00
February-02	1,301.45	0.00
March-02	3,777.55	110.83
April-02	4,821.70	1,372.90
May-02	1,868.20	1,023.86
June-02	590.65	0.00
July-02	1,836.00	419.89
August-02	1,757.75	0.00
September-02	3,339.25	0.00
October-02	3,592.95	170.79
November-02	2,881.15	87.30

December-02	1,513.05	93.78
January-03	904.00	232.35
February-03	1,060.75	184.22
March-03	1,152.40	337.82
April-03	None	1,361.04
May-03	2,683.85	294.41
June-03	None	475.15
July-03	None	0.00
August-03	None	79.68
September-03	None	0.00
October-03	None	767.92
November-03	None	101.89
<b><u>Totals:</u></b>	<b><u>\$71,156.40</u></b>	<b><u>\$12,324.21</u></b>

11. The Commonwealth of Pennsylvania issued checks payable to the Senator based on the fraudulent legislative expense vouchers submitted by defendant SUSAN SKOTNICKI. Upon receipt of these fraudulently obtained reimbursement checks from the Commonwealth of Pennsylvania, defendant SKOTNICKI signed the Senator's name on the back side of the checks and deposited them into an account she jointly held with the Senator at First Union National Bank in Philadelphia. Defendant SKOTNICKI then prepared and sent by United States mail a check from the funds deposited into that account directly to La Veranda to pay the actual amounts owed to the restaurant, and then, using the excess amounts paid by the Senate, would separately write checks made payable to herself in varying amounts, which she deposited into her own, separate account at First Union National Bank; or wrote checks payable to her creditors.

12. In part, between January 1, 2001, and January 22, 2004, using the proceeds of the fraudulent scheme described above, defendant SUSAN SKOTNICKI issued approximately 89 checks payable directly to herself, from the account in which the reimbursement checks were deposited, receiving approximately \$63,000 in fraudulently obtained proceeds.

13. On or about December 28, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

**SUSAN SKOTNICKI,  
a/k/a "Susan Swett,"**

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused an envelope to be delivered by the United States Postal Service from Harrisburg, Pennsylvania to La Veranda in Philadelphia, Pennsylvania, according to the directions thereon, containing check number 09133192 in the amount of \$869.81, drawn on the Mellon Bank account of the Commonwealth of Pennsylvania, and made payable to La Veranda.

All in violation of Title 18, United States Code, Section 1341.

**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1341 (Mail Fraud), set forth in this information, defendant

**SUSAN SKOTNICKI,  
a/k/a "Susan Swett,"**

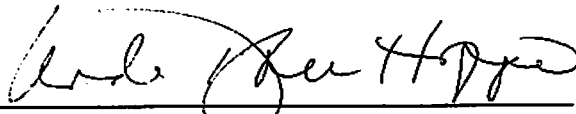
shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense, including, but not limited to, the sum of \$63,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

  
FOR LAURIE MAGID  
ACTING UNITED STATES ATTORNEY